

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**CORE WIRELESS LICENSING)
S.A.R.L.,)
Plaintiff,) CIVIL ACTION NO. 6:12-CV-100
vs.)
JURY TRIAL DEMAND
APPLE INC.,)
Defendant.)**

CORE WIRELESS LICENSING S.A.R.L.'S TRIAL WITNESSES LIST

Plaintiff Core Wireless Licensing S.a.r.l. (“Core Wireless”) pursuant to the Court’s Docket Control Order entered in this case, submits the following preliminary list of witnesses whom it may call at trial, other than solely for impeachment or rebuttal. Core Wireless reserves the right to supplement or revise this list in the future if necessary for any reason. This list includes witnesses that Core Wireless may call either live at trial or by deposition testimony. Core Wireless further reserves the right to call any of the witnesses that Apple identifies on its witness list without prejudice to its right to object to Apple’s presentation of those witnesses at trial, the admissibility of those witnesses’ testimony, or its right to move for the exclusion of those witnesses’ testimony.

At this time, Core Wireless identifies the following witnesses for trial:

	Witness (Employer)	Will Call	May Call	Probably Will Not Call	Topics of Examination
1.	Abdul Zindani (Conversant)		X		Patent prosecution of Core Wireless Patent Portfolio related to U.S. Patent Nos. 7,804,850; 7,447,181
2.	Phillip Shaer (Conversant)		X		Information about the formation and operation of Core Wireless, acquisition of the Patent Portfolio at issue, and licensing negotiations with Apple
3.	John Lindgren (Conversant)	X			Information about the formation and operation of Core Wireless, acquisition of the Patent Portfolio at issue, and licensing negotiations with Apple

4.	Antti Toskala (NSN)	X			Nokia Corporation; Nokia's development of mobile phone technology; Mr. Toskala's involvement with standard setting bodies on Nokia's behalf
5.	Esa Malkamaki (Nokia)	X			U.S. Patent No. 7,804,850
6.	Harri Lilja (Nokia)	X			U.S. Patent No. 6,266,321
7.	Jukka Vialen (Cassidian)	X			U.S. Patent No. 7,804,850
8.	Mika Forssell (NSN)	X			U.S. Patent Nos. 7,447,181; 7,529,271, 8,259,689
9.	Paul Melin (Nokia)	X			Nokia Corporation; Nokia's development of mobile phone technology and contribution to cellular standards; Development and licensing of Nokia's intellectual property
10	Nima Ahmadvand (Conversant)		X		Information about the formation and operation of Core Wireless, the Core Wireless patent portfolio; acquisition and licensing of the Patent Portfolio at issue
11	Johan Bergman (Ericsson)		X		Development of relevant standard
12	Adolfo Bayo (Cetecom)		X		Standard conformance tests of Apple products

13	Uttam Pattanayak (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
14	Deirdre O'Shea (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
15	Nate Chizgi (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
16	Sitaramanjaneyulu Kanamarlapudi (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
17	Yi Zhang (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
18	Simon Walke (Qualcomm)		X		Qualcomm baseband chip source code and corresponding technologies and standards
19	Matthew Penarczyk (Microsoft)		X		Microsoft's negotiations with Nokia and Conversant; Formation of Core Wireless
20	David Killough (Microsoft)		X		RAND and FRAND obligations
21	Niklas Ostman (Microsoft)		X		License negotiations between Apple and Nokia

22	Frank Casanova (Apple)		X		Marketing of the accused products; Value of the claimed inventions
23	Evans Hankey (Apple)		X		Research, design, development, and operation of accused products; Value of the claimed inventions
24	Stephen V. Schell (Apple)		X		Implementation of certain aspects of wireless functionality of the accused products
25	Mark Buckley (Apple)		X		Apple financial information
26	Tiberiu Muresan (Apple)		X		Certifications/testing related to the accused Apple products' operability on networks that support cellular standards
27	Jeffrey Risher (Apple)		X		Apple licenses and licensing practices; FRAND licensing; License negotiations for cellular technology; Apple's knowledge and willful infringement of the Patents-in-Suit
28	Richard Buttrick (Core Wireless expert)	X			ETSI IPR Policy; Custom and practice of ETSI members
29	Richard A. Chandler (Core Wireless expert)	X			Infringement; Validity; Technical matters relating to the patents-in-suit
30	Dr. James L. Olivier (Core Wireless expert)	X			Infringement; Validity; Technical matters relating to the patents-in-suit

31	Trevor J. Smedley (Core Wireless expert)	X			Technical matters relating to the patents-in-suit
32	Roy Weinstein (Core Wireless expert)	X			Damages
33	Luc Gerondal (Manager of Core Wireless)		X		Information about the formation and operation of Core Wireless
34	Philippe Salpetier (Manager of Core Wireless)		X		Information about the formation and operation of Core Wireless,
35	Matthias Schneider (Manager of Core Wireless)		X		Information about the formation and operation of Core Wireless
36	Ulrich Amrhein (Apple)		X		Certifications/testing related to the accused Apple products' operability on networks that support cellular standards
37	Alex Ho (Apple)		X		Apple source code
38	Karri Ranta-Aho (NSN)		X		Matters relating to the patents-in-suit
39	Wayne Stark (Apple Expert)		X		Technical matters relating to the patents-in-suit
40	Edward Knightly (Apple Expert)		X		Technical matters relating to the patents-in-suit
41	Thomas Fuja (Apple Expert)		X		Technical matters relating to the patents-in-suit
42	Vernon V. Palmer (Apple Expert)		X		French law

Dated: June 17, 2014

Respectfully Submitted,

By: /s/ Henry C. Bunsow

Henry C. Bunsow (California State Bar # 60707)
Denise M. De Mory (California State Bar #168076)
Brian A.E. Smith (California State Bar # 188147)
Craig Y. Allison (California State Bar # 161175)
BUNSOW, DE MORY, SMITH & ALLISON LLP
351 California Street, Suite 200
San Francisco, CA 94133
Telephone: (415) 426-4747
Facsimile: (415) 426-4744
Email: hbunsow@bdiplaw.com
Email: ddemory@bdiplaw.com
Email: bsmith@bdiplaw.com
Email: callison@bdiplaw.com

T. John Ward, Jr. (Texas Bar # 00794818)
Wesley Hill (Texas Bar # 24032294)
WARD & SMITH LAW FIRM
1127 Judson Road, Suite 220
Longview, Texas 75601
Telephone: (903) 757-6400
Facsimile: (903) 757-2323
Email: jw@wsfirm.com
Email: wh@wsfirm.com

Attorneys for Plaintiff
CORE WIRELESS LICENSING S.A.R.L.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed.R.Civ.P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of this document via email, Federal Express and/or U.S. First Class Mail.

Dated: June 17, 2014

/s/ Henry C. Bunsow

Henry C. Bunsow